

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PAUL PHILIPPE OF ROMANIA, on behalf
of the ESTATE OF KING CAROL II OF
ROMANIA,

Plaintiff,

-against-

CHRISTIE'S, INC.,

Defendant.

Case No.: 1:25-cv-01151-LLS

**DECLARATION IN SUPPORT OF
STATE OF ROMANIA'S MOTION TO
DISMISS FOR LACK OF
JURISDICTION, OR,
ALTERNATIVELY, MOTION TO STAY
PENDING STATE COURT ACTION**

CHRISTIE'S, INC.,

Counterclaim and Third-
Party Plaintiff,

-against-

PAUL PHILIPPE OF ROMANIA, on behalf
of the ESTATE OF KING CAROL II OF
ROMANIA,

Counterclaim Defendant, and

ACCENT DELIGHT INTERNATIONAL
LTD. and STATE OF ROMANIA,

Third-Party Defendants.

ACCENT DELIGHT INTERNATIONAL
LTD.,

Interpleader Defendant and
Cross-Claim Plaintiff,

-against-

PAUL PHILIPPE OF ROMANIA, on behalf
of the ESTATE OF KING CAROL II OF
ROMANIA, and STATE OF ROMANIA,

Interpleader Defendants
and Cross-Claim
Defendants.

I, Paul F. Downs, declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am over the age of 18 and I make this declaration based on personal knowledge.
2. I am an attorney with the law firm Nixon Peabody LLP, Tower 46, 55 West 46th Street, 24th Floor, New York, NY 10036 representing interpleader and third-party defendant the State of Romania (“Romania”).
3. I make this declaration in support of Romania’s Motion to Dismiss based on my information, knowledge and belief and the records in this matter.
4. Attached as Exhibit A is a true and correct copy of a page from the Romanian Police website (<https://politiaromana.ro/ro/persoane-urmarite/al-romaniei-paul-philippe-1381948>) with a certified translation of relevant information.
5. Attached as Exhibit B is a true and correct copy of an April 7, 2025 article from Europa Liberă România (“Free Europe Romania”), with certified translation, regarding the arrest of Paul Philippe.
6. Attached as Exhibit C is a true and correct copy of the Complaint (without exhibits) that Romania filed in the Supreme Court of New York for New York County, Index No. 651068/2025, on February 26, 2025.
7. Attached as Exhibit D is a true and correct copy of the First Amended Complaint (without exhibits) that Romania will file in the Supreme Court of New York for New York County, Index No. 651068/2025, upon the court’s approval of the stipulated, proposed order that is being filed separately.
8. Attached as Exhibit E is a true and correct copy of the signed statement from Romania’s Ministry of Culture, dated January 30, 2025, including exhibits thereto.

9. Attached as Exhibit F is a true and correct copy of an excerpted article from the New York Times, dated October 11, 1914, concerning the death of the Romanian King.

10. Attached as Exhibit G is a true and correct copy of the October 18, 1914 issue of the ROMÂNUL newspaper, Nr. 219, which includes an article about the opening of King Carol I's will, including certified translation of relevant portions.

11. Attached as Exhibit H is a true and correct copy of a Stipulation that will be filed in the Supreme Court of New York for New York County, Index No. 651068/2025.

12. Attached as Exhibit I is a true and correct copy of a letter from Nixon Peabody LLP to counsel for Christie's Inc., dated February 26, 2025.

13. Attached as Exhibit J is a true and correct copy of a Demand Letter from Nixon Peabody LLP to counsel for Christie's Inc., dated January 29, 2025.

14. Attached as Exhibit K is a true and correct copy of a Demand Letter from Nixon Peabody LLP to counsel for Accent Delight International Ltd., dated January 29, 2025.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 30th day of May, 2025.



Paul F. Downs